

Hearing Date: January 14, 2013 at 9:00 a.m.(ET)  
Objection Deadline: November 29, 2012 at 4:00 p.m. (ET)

**LOWENSTEIN SANDLER PC**

1251 Avenue of the Americas, 17th Floor  
New York, New York 10020  
(212) 262-6700 (Telephone)  
(212) 262-7402 (Facsimile)  
Michael S. Etkin (ME 0570)  
Ira M. Levee (IL9958)  
Andrew D. Behlmann (AB1174)

and

65 Livingston Avenue  
Roseland, New Jersey 07068  
(973) 597-2500 (Telephone)  
(973) 597-2400 (Facsimile)

*Bankruptcy Counsel for Union Central Life  
Insurance Company, Americas Life Insurance  
Corporation, and Acacia Life Insurance Company*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 12-12020 (MG)  
(Jointly Administered)

Re: Docket No. 1887

**JOINDER OF UNION CENTRAL LIFE INSURANCE COMPANY, AMERITAS LIFE  
INSURANCE CORP., AND ACACIA LIFE INSURANCE COMPANY TO LEAD  
PLAINTIFF'S LIMITED OBJECTION TO DEBTORS' SECOND SUPPLEMENTAL  
MOTION PURSUANT TO FED. R. BANKR. P. 9019 FOR APPROVAL OF RMBS  
TRUST SETTLEMENT AGREEMENTS**

1. Union Central Life Insurance Company, Ameritas Life Insurance Corp., and Acacia Life Insurance Company (collectively "Union Central"), plaintiffs in the civil action styled as *Union Cent. Life Ins. Co. et al. v. Credit Suisse First Boston Mortg. Sec. Corp. et al.*, pending in the United States District Court for the Southern District of New York, Case No. 11-CV-2890 (GBD) (the "Union Central Action"), hereby join in the *Lead Plaintiff's Limited*

*Objection to Debtors' Second Supplemental Motion Pursuant to Fed. R. Bankr. P. 9019 for Approval of RMBS Trust Settlement Agreements* (the "Lead Plaintiff Limited Objection")<sup>1</sup> [Docket No. 2302] filed by New Jersey Carpenters Health Fund, on behalf of itself and the Class, in response to the RMBS 9019 Motion [Docket No. 1887].

2. The procedural history of the Union Central Action is set forth in detail in the *Joiner of Union Central Life Insurance Company, Ameritas Life Insurance Corp., and Acacia Life Insurance Company to Objection of New Jersey Carpenters Health Fund to Debtors' Motion to Extend the Automatic Stay or, in the Alternative, for Injunctive Relief Enjoining Prosecution of Certain Litigation Against Debtors' Directors and Officers and Non-Debtor Corporate Affiliates* [Adv. No. 12-ap-01671-MG, Docket No. 42], and is incorporated herein by reference.

3. Union Central further submits that any order entered approving the RMBS Trust Settlement Agreement should provide the following language:

Nothing in the RMBS Trust Settlement Agreement or in this Order shall or is intended to affect, release, enjoin, or impact in any way the prosecution of claims asserted, or to be asserted, (a) against any Debtor or non-Debtor defendant named or to be named in the action styled as *Union Cent. Life Ins. Co. et al. v. Credit Suisse First Boston Mortg. Sec. Corp. et al.*, pending in the United States District Court for the Southern District of New York, Case No. 11-CV-2890 (GBD) or (b) in any proof of claim filed by Union Central Life Insurance Company, Ameritas Life Insurance Corp., and/or Acacia Life Insurance Company in these Chapter 11 Cases.

[signature page follows]

---

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Lead Plaintiff Limited Objection.

Dated: November 29, 2012  
New York, New York

Respectfully submitted,

/s/ Michael S. Etkin

**LOWENSTEIN SANDLER PC**

Michael S. Etkin (ME 0570)

Ira M. Levee (IL9958)

Andrew D. Behlmann (AB1174)

1251 Avenue of the Americas, 17th Floor

New York, New York 10020

(212) 262-6700 (Telephone)

(212) 262-7402 (Facsimile)

and

65 Livingston Avenue

Roseland, New Jersey 07068

(973) 597-2500 (Telephone)

(973) 597-2481 (Facsimile)

*Bankruptcy Counsel for Union Central  
Life Insurance Company, Americas Life  
Insurance Corporation, and Acacia Life  
Insurance Company*